



# GMD SHIPYARD CORP.

BROOKLYN NAVY YARD BLDG. #595

63 FLUSHING AVENUE, UNIT #276

BROOKLYN, NY 11205

TEL: (718) 260-9200

FAX: (718) 260-9284

Chief, Water Compliance Branch- Mr. Douglas McKenna  
Division of Enforcement and Compliance Assistance  
U.S. Environmental Protection Agency – Region 2  
290 Broadway – 20<sup>th</sup> Floor  
New York, New York 10007-1866

22 September 2014

Joseph DiMura, P.E., Director  
Bureau of Water Compliance Programs  
Division of Water, NYSDEC  
625 Broadway  
Albany, New York 12233-3506

Re: GMD Shipyard Administrative Compliance Order CWA-02-2014-3050

Mr. Douglas McKenna & Mr. Joseph DiMura,

The subject order requires GMD Shipyard to give you an update of progress and of completed specific items as listed under section "C. Ordered Provisions". Item number one (1) of section (C) required that GMD acknowledge receipt and send back a signed copy of the subject compliance order. This was accomplished and the acknowledgement sent to you

The following are the listed items, in order, which appear on the schedule which starts on page 11 of the subject order:

Item (i) – submit permit application to NYS DEC, with a copy to EPA, to obtain SPDES permit coverage for non-stormwater discharges to the East River from the Facility. NYS DEC has been contacted and a request has been made to ascertain the process to obtain additional SPDES permits. GMD have also sought and received the assistance of Mr. Nickolas Mann of Quay LLC, who had accomplished NYS DEC SPDES permits for the Brooklyn Navy Yard. GMD have yet to received direction and or the forms needed to apply for the(se) permit(s) from NYSDEC. GMD is working with NYS DEC and will continue to work with NYS DEC to obtain whatever permit they deem necessary. For the present GMD has not received the forms or direction on how to proceed. GMD Shipyard will cooperater and act quickly once guidance from NYS DEC is given on how to proceed.

In response to the removal of materials from the Graving Dock. GMD Shipyard has been actively soliciting to remove the existing pile of used grit and dredge soil from the south side of the shipyard. That area designated as the used grit storage area. The

existing pile has been sampled in multiple areas so as the pile is well represented by sampling. Inquiries have been sent to multiple landfills in an effort to find what landfill(s) are available to accept this product. The material in the graving dock will be removed and placed in the used grit location as soon as some an area is available to place the material without having it put on top of the existing grit pile.

Item (ii) Other than the existing remaining grit soil that is in the graving dock all areas of the docks have ongoing cleaning efforts. All garbage and waste materials that could be exposed to storm water have been removed and disposed of properly. The eleven (11) used paint cans and trash in the dumpster on Berth 9 have been disposed of, the twenty (20) used paint cans on berth 9 have been picked up and properly disposed of, the noted large grit pile partially uncovered with adjacent spilled spent grit has been cleaned up and disposed of, the clam shell that had contained grit and trash on Berth 8 has been cleaned and the contents disposed of, the blasting grit spilled on a catch basin on berth 8 has been cleaned up, and the uncovered dumpster continuing waste on Berth 8 has been cleared and cleaned of trash.

(b) Storm water catch basins are being completely cleaned out. The entire storm drain system from our main gate down to the water by Berth 8B is being cleaned off all debris, nine of 18 have been completely cleaned. See attachment photos Enclosure 1 through 4. The end of the "Stormwater Outfall 004" system is presently cut off since the end of that pier has been removed and is under construction. The last sixty plus feet of that pier and leading to what was called Berth 8A has been removed for the installation of new pilings and bulk heading. See photographs on the Dry Weather Inspection Report, Enclosure (10). When that work is complete the storm water outflow will be opened again. When the soil pile is removed, those storm drains that exist under the pile, will be opened and cleared of debris.

(c) Work to empty the debris from the graving docks has not started pending removal of some from the present pile

The two small piles of sediment and grit that had been at the north sides of Graving Dock #5 had been removed and disposed of.

(d) Work to remove the oil spill stains that were located inside the hazardous waste area has taken place. Remnants of the oil spill stains did not come out but efforts have been made to get the stain out. The pooling waters with oil sheens mentioned in (d)(2) and (d)(3) have been cleaned up and oil debris put in drums for disposal as oily waste water and debris. See Enclosure 5 and 6.

(e) Concerning the mixing of paints and chemicals as directed in this item. Training on the requirements of SWPP has been held. [Enclosure 6]. The paint department has been directed not to mix paints unless within a covered spill containment. All shipyard members have received training in the requirements of SWPP. Whenever we are using a 55 gal drum or container of any sort the container will be inside a spill try or container

made of non-porous material so that any spilled materials will not make contact with the ground. See Enclosure 7 and 8.

All paint cans, containers, 55 gal drums, have been picked up in the yard. Both grit piles has been completely covered pending removal. The clam shell type container has been cleaned of spent grit. The blasting glass spilled material referenced has been cleaned up.

GMD has also accomplished a facility dry weather inspection. This was accomplished on September 5, 2014. A copy is Enclosure 10.

As for the costs associated with accomplishing the cleanup of the yard:

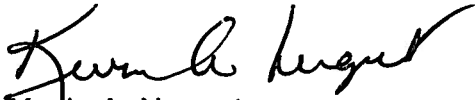
- a) For cleaning out the storm drains, which is continuing on a day by day basis. To date we have used 456 man hours which is the equivalent to \$29,640.00. Cost to analyze the material to determine if it is hazardous waste, we do not yet have the analysis results, cost is approx. \$ 650.00. After the results of the analysis are known, the cost to dispose of the debris will be determined.
- b) For purchasing storm drain covers, we are experimenting with various types, So far we have spent \$ 1120.00 to cover the cleaned out drains of stormwater outflow 002, we will be purchasing more as we clean out the drains for outflows 3 and 4.
- c) For working to accomplish new permits: 18 mhrs
- d) To accomplish training of managers in the requirements of SWPPP:
  - i) Training for shipyard managers 9/10: 13 men x 1.0 hours = 13 mhrs
  - ii) Generic SPDES/SPPP training for all shipyard workers 9/12: 38 men x 1.0 hours=38.0 mhrs
  - iii) Specific training of BMP #1 to all shipyard workers 9/17: 46 men x 1.0hr = 46 mhrs
  - iv) To put together a paint booth for mixing paints and chemicals – ‘ongoing’, to date 120 mhrs and \$1900.00 in materials, which is roughly \$9700.00
- e) For cleaning the old spills in the hazardous waste area:
  - i) 4 men x 12 hours, roughly \$3120.00
  - ii) Disposal of one drums nonhazardous oil spill solids, roughly \$115.00 plus shipping
- f) For disposing oil contaminated debris in drums from cleanup of oily storm water, disposing drum of oily waste is roughly \$115.00 plus shipping
- g) For purchasing covers to be placed over disposal dumpsters to keep debris from coming out after dumpster has been used. Purchase four covers.Approx.\$800.00
- h) For cleaning up spilled glass grit from south side of Graving Dock #5, north side of Graving Dock #6 and south side of Graving Dock #6.. For cleaning up spilled black beauty grit from north side of Graving Dock #6.
  - i) 4 men for 8 hours or 32 mhrs; this equates to approx. \$ 2,080.00

ii) the unused spilled grit was placed on the grit pile and will be sent out when the grit pile is disposed of (new grit does not damage the analysis already done)

- i) For cleaning up the catch basin area adjacent to Dry Dock #1
  - i) a minimum of 4 men x 8 hours = 32 mhrs, which is roughly \$2,080.00
  - ii) Disposal of waste materials from Graving Dock #1. \$15,600.00

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry or the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Regards,



Kevin A. Nugent  
HSE Director  
knugent@gmdshipyard.com

Enclosures:

- 1) Photograph of cleaned out storm drain
- 2) Photograph of different version of storm drain that has been cleaned out
- 3) Photograph of a cleaned out storm drain without cover
- 4) Photograph of a different cleaned out storm drain without cover
- 5) Photograph of men cleaning the spilled debris inside the hazardous waste drum area
- 6) Photograph of men cleaning the spilled debris marks inside the haz waste area
- 7) GMD SWPPP Training for Managers – Training sign in plus 2 sheets
- 8) GMD SWPPP and SPDES Training for Entire Shipyard – Training sign in plus 6 sheets
- 9) GMD Shipyard Best Management Practices Training Part 1 – Training sign in plus 6 sheets
- 10) GMD Shipyard Annual Dry weather storm drain flow inspection dated 5Sept2014

Photographs:



Enclosure 1



A different drain cover design at GMD. Drain was cleared of all debris.  
Enclosure 2



Drain cleared to the bottom - Enclosure 3



Another drain cleared to the bottom - Enclosure 4



Clean up of drum area – enclosure 5



Clean up of drum area – Enclosure 6

(Enclosure 7)  
(3 Pages)

GMD SHIPYARD CORP.

**GMD SWPPP Training for Managers Sign In Sheet**

10 September 2014

Sign In: (print name)

(Sign Name)

1. Daniel J. Smith
2. Burchell Gordy
3. MARIA REINATZ
4. [Signature]
5. Frank Foster
6. Danny Garcia
7. Robert St Bernard
8. G. R. Koon
9. Ed Jordan
10. Ken Peterson
11. LOGAN ADAMS
12. GUILLER BANCABONG
13. Ruben Cruz
14. \_\_\_\_\_
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1. D. J. Smith
2. Burchell Gordy
3. [Signature]
4. [Signature]
5. Frank Foster
6. Daniel Garcia
7. Robert St Bernard
8. G. R. Koon
9. Ed Jordan
10. Ken Peterson
11. Logan Adams
12. Guiller Bancabong
13. Ruben Cruz
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Held By  
Kevin Nugent

Print Name

Sign

Training was a VIDEO, Handout & Discussion. From 11:00 AM to 12:00 PM.  
1. [www.michigan.gov/deq](http://www.michigan.gov/deq) - SPAN WATER employee training  
2. Smp section 6 - Employee training

## **6.0 EMPLOYEE TRAINING**

Employee training is essential to effective implementation of the Best Management Practice plan at the Facility. The purpose of the training is to teach personnel at all levels of responsibility the components and goals of the BMP plan. Trained Facility personnel are more capable of preventing spills, responding safely and effectively to an accident when one occurs, and recognizing situations that could lead to storm water contamination.

Training topics include:

- Environmental laws and regulation;
- Pollution prevention goals and concepts;
- Spill Prevention and response;
- Good Housekeeping practices; and
- Material Management practices.

All new employees receive eight-hour facility specific training. Four-hour refresher training sessions are held annually for all spill response personnel.

### **6.1 Training Procedures**

Proper training of employees in equipment operation and maintenance can reduce both the number and the severity of discharges. Training also helps employees develop response skills, such as communication with the remedial contractors, familiarity with the BMP plan, and spill prevention skills. Facility personnel training forms (Appendix G) are maintained for a minimum of three years. Training records are maintained for each employee for as long as he/she is assigned responder duties, and for each instructor or training organization providing the training.

The following sections provide effective storm water pollution prevention training program for the Facility.

#### **6.1.1 Spill Prevention and Response**

Spill prevention and response procedures are described in detail in Section 5.0. These procedures and plans are presented in the training program in order to ensure all plant employees, not just those on the spill response teams, are aware of what to do if a spill occurs. Specially, all employees involved in the individual activities of the facility are trained about the following measures:

- Identifying potential spill areas and drainage routes, including information on past spills and causes;
- Reporting spills to appreciate individuals, without penalty (e.g. employees should be provided "amnesty" when they report such instances);
- Specifying material handling procedures and storage requirements;

- Implementing spill response procedures.

On-site contractors and temporary personnel shall also be informed of the plant operations and design features in order to help prevent accidental discharge or spills from occurring.

#### **6.1.2 Good Housekeeping**

Facility personnel shall be trained in how to maintain a clean and orderly work environment. Section 4.1 above outlines the steps for practicing good housekeeping. Emphasis of these points in the good housekeeping practices is part of the Facility's training program, which includes:

- Require regular cleaning by vacuuming and/or sweeping;
- Promptly clean up spilled materials to prevent polluted runoff;
- Identify places where brooms, vacuums, sorbents, neutralizing agents, and other spill response equipment are located;
- Display signs reminding employees of the importance and procedures of good housekeeping;
- Discuss updated procedures and report on the progress of practicing good housekeeping at every meeting;
- Provide instruction on securing drums and containers and frequently checking for leaks and spills; and
- Outline a regular schedule for housekeeping activities to allow you to determine that the job is being done.

#### **6.1.3 Material Management**

Personnel are trained in how to manage materials, which are currently used, stored, and disposed at the Facility. Section 3.3 above outlines the steps for material management. Emphasis of these practices in the material management is part of the Facility's training program that includes:

- Neatly organize materials for storage;
- Identify all toxic and hazardous substances stored, handled, and produced on-site;
- Discuss handling procedures for these materials; and
- Discuss reuse, recycling and disposal requirements for waste, both hazardous and non-hazardous, at the Facility.

GMD Shipyard Corp.

Enclosure 8  
(7 Pages)

Stormwater Pollution Prevention Plan Contents



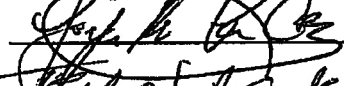
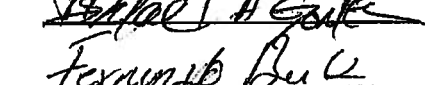
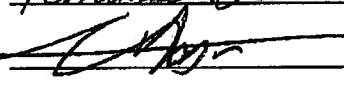

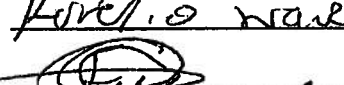
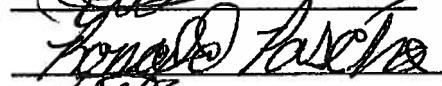

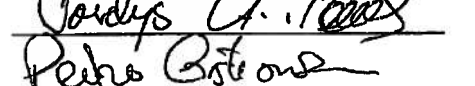
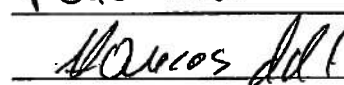
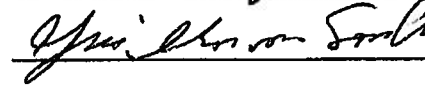
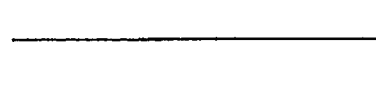
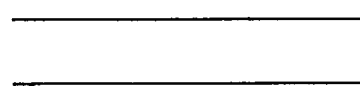
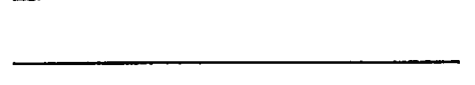
12 September 2014

SUBJECT: Stormwater Pollution Prevention Plan and SPDES Training

Print Name

Sign Name

1. Ruben Cruz
2. Gene Castelan
3. George De La Cruz
4. Ismael Lopez
5. Fernando Bull-
6. Pedro Albarado
7. Waldemar Naves
8. Horacio Naves
9. Fidel Clemente
10. Ronald Paschal
11. Fernando Ventura
12. Jordys A. Reed
13. Pedro Estroza
14. Marcos DelCastillo
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22. ~~filadelfo~~ Lopez  
23. Danilo Mena  
24. ~~JUAN VILLAS~~  
25. ~~Jose Lopez~~  
26. Ismael Sotelo  
27. ~~Andri's Adame~~  
28. JUAN LANTICUA  
29. VICTOR. M. SOSA  
30. Juan corte  
31. Pedro D. Andrew  
32. Jesus Jimenez  
33. ERIC ABULCAN  
34. Wendell Sun  
35. Branchell Sompay  
36. ~~Frank Foster~~  
37. ~~N. L. Linares~~  
38. ~~Carlos Ramirez~~  
39. Edwin Pacheco  
40. Wayne Cerinter  
41. Ruben Feijoo  
42. John Altman  
43. ~~MARCO F. P. P.~~  
44. Valentin Francisco  
45. \_\_\_\_\_

- ~~filadelfo~~ Lopez  
~~Dani~~  
~~Jose Lopez~~  
~~Ismael Sotelo~~  
~~Juan Lanticua~~  
~~VICTOR. M. SOSA~~  
Juan corte  
Pedro D. Andrew  
Jesus Jimenez  
~~ERIC ABULCAN~~  
W. Sun  
Branchell Sompay  
~~Frank Foster~~  
~~N. L. Linares~~  
~~Carlos Ramirez~~  
Edwin Pacheco  
Wayne Cerinter  
Ruben Feijoo  
Choner  
  
Valentin Francisco  
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Held By

Kevin Nugent

Print Name

DANNY GARCIA  
TRANSLATING

Sign

 7/12/2014

**Training follows shipyard Best Management Practices. 1) The Requirements of SPPP, 2) discussion of issues that will impact water cleanliness, 3) the requirement to keep the shipyard clean**

**U:\my documents\Environment Safety Training\week 091214**

Time Period 1500 to 1600

Discussion covers topic attached w/ Q & A for all employees.

Danny Garcia Translated

1. The shipyard has outflows: Stormwater is not <sup>Just</sup> stormwater, we have discharges of water from the stormdrains and we have discharges of water from the graving docks. All fall under stormwater so do not be confused
2. The water in the drains and in the dock that are allowed to drain into Wallabout Bay, have to be clean water. All efforts must be made to not contaminate the water before it enters the drains. Many of the practices we had employed have to meet our published Best Management Practices. For example: 1) when working on equipment – no oil can be spilled on the pavement, to prevent this you use spill prevention procedures, use spill trays, use oil spill pads. Line the ground with protection, either plastic or a tarp that will stop oil from impacting the ground.  
2) when putting sandblast grit into the pots, get a big funnel, and use a spill tray to prevent spilling grit on the ground  
3) when welding, when you use a welding rod, do not drop the last part on the ground, instead collect it and put it in a steel drum for disposal. Do not let it land on the ground.  
4) when mixing paint, always mix paint inside a paint container. Never mix paint on the ground.  
5) when draining either machinery, a rudder, a vessel. Think first, what if there is a wind, is the drum close enough to catch the product, is a wind shield needed, is the drum on a spill tray. No 55 gal drum should be getting filled without a spill tray under it just in case the product spill  
6) when fueling equipment, the machine is off, there is spill equipment at the ready, there is a fire extinguisher at the ready, if a spill occurs it is cleaned up ASAP
3. Regulated activity:
  - a. vessel and equipment cleaning
  - b. mechanical repairs
  - c. Parts cleaning
  - d. Sanding
  - e. welding
  - f. refinishing
  - g. painting
  - h. fueling
  - j. storage of material and waste
4. The following materials are not covered by a generic stormwater plan:
  - a. bilge and ballast water
  - b. sanitary waste
  - c. Pressure wash water
  - d. cooling water originating from vessels

These discharges are regulated by SEPARATE NPDES permits.

**5. Engine Parts Washing:**

a. parts should be rinsed or air dried over the parts cleaning container

b. prevent and contain spills and drips

c. Water soluble engine washing fluids should be treated as the same manner as other industrial wastewaters and either recycled or disposed of by a licensed waste hauler.

**6. Surface prep, sanding, and paint removal**

a. cover drains, trenches and drainage channels to prevent entry of blasting debris to the system

b. where sanding or activity is conducted with the vessel afloat, boom the vessel in and pad out the material that goes in the water and is boomed in.

c. prohibit blasting or sanding activities performed during windy conditions which render containment ineffective

d. use vacuum sanding systems to collect sanding dust as it is created

**6. Surface prep, paint removal;**

a. collect spent abrasives routinely and store under a cover to await proper disposal

b. store and re-use used strippers when possible. Solvent strippers, particularly stripping baths, can generally be reused several times before their effectiveness is diminished

c. Inspect the areas regularly to ensure Best Management Practices are implemented.

d. Train employees on waste control and disposal procedures

**7. Painting**

a. hand plastic barriers or tarpaulins during blasting or painting operations to contain debris

b. mix paints and solvents in designated areas away from drains, ditches, piers and surface waters, preferably under cover

c. have absorbent and other cleanup items readily available for immediate clean up of spills

d. empty all paint cans, allow paint cans to dry before disposal

e. store paint and paint thinner away from traffic areas to avoid spills

**8. Drydock Maintenance**

- a. clean and maintain drydock on a regular basis to minimize the potential for pollutants in the stormwater runoff
- b. sweep accessible areas of the drydock to remove and properly dispose of debris and spent sandblast material prior to flooding dock
- c. have absorbant materials at the ready to respond to any spills

**9. Vehicle and equipment fueling"**

- a. use drip pans under transfer hose
- b. use fueling hoses with check valves to prevent hose drainage after filling
- c. ensure the fueling vehicle is equipped with a manual shut off valve
- d. do not top off any fuel tank on any equipment, fill to about 95%

**10. Engine Maintenance and Repairs**

- a. move work indoors or create temporary work enclosures using heavy gauge plastic or plywood
- b. conduct the cleaning operations in an area with a concrete floor with no floor drainage
- c. if operations are uncovered, perform them on concrete pad that is impervious and contained
- d. park vehicles and equipment indoors and under a roof whenever possible and maintain proper control of oil leaks and spills.
- e. check vehicles closely for leaks and use pans to collect fluids when leaks occur.

**11. Shipyard Sanitary Waste Disposal**

- a. discharge sanitary wastes in tanks, or shipyard sanitary system
- b. develop and implement spill plans

**12. Bilge and Ballast Water**

- a. Collect and dispose of bilge and ballast waters which contain oils, solvents, detergents, or other additives to a licensed waste disposal facility.

Enclosure 9  
(7 Pages)

GMD Shipyard Corp.

Safe Shipyard Practices

Sign in Sheet

17 September 2014

SUBJECT: GMD Shipyard Best Management Practices Training, Part 1

Print Name

1. Burchell Portley
2. Israel Sobko
3. GUILLEMO SANCHEZ
4. ALEXANDER MEDINA
5. VICTOR M. SOSA
6. Wendell Sun
7. Flavelio Navarrete
8. Ricardo Perez
9. Tom Sun
10. Suan Cortez
11. Rene Ventura
12. MARCOS DELESTILLO
13. SUAN VILLAR
14. FRANCISCO VENTURA
15. John Alhura
16. ANTOLIA VALETA
17. Valdemar Roque
18. Filadelfo Lopez
19. Fidel Clemente

Continued page 2

Sign Name

1. Burchell Portley
2. Israel Sobko
3. G. Sanchez
4. Alex Medina
5. VICTOR S
6. W. Sun
7. Flavelio Navarrete
8. Ricardo Perez
9. Tom Sun
10. Suan Cortez
11. Rene Ventura
12. Marcos Delestitlo
13. Suan Villar
14. Francisco Ventura
15. John Alhura
16. Antolia Valeta
17. Valdemar Roque
18. Filadelfo Lopez
19. Fidel Clemente

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44. Rene Arsten
45. Ismael A Gomez
46. Ruben Fajoo
47. FRANK Foster
48. Fernando Buitan
49. Ruben Cruz
50. ANDRIS Adames
51. JUAN LANTICOR
52. Jesus Sanchez
53. Jorge de la Cruz
54. ERIC BOULCHAK
55. Pedro D. Andrau
56. Pedro Cristobal
57. Edwyn Pacheco
58. Vernon Lewis
59. Wayne H.
60. L. Friday
61. Valentin Francisco
62. Kerlotison
63. EDGAR ADAMS
64. JUAN RODRIGUEZ
65. Paulo ALVARADO
66. Danilo Mena
67. JAMES Kishuk

- Rene Arsten
- Ismael A Gomez
- Ruben Fajoo
- FRANK Foster
- Fernando Buitan
- Ruben Cruz
- ANDRIS Adames
- Juan Lanticor
- Jesus Sanchez
- Jorge de la Cruz
- ERIC BOULCHAK
- Pedro D. Andrau
- Pedro Cristobal
- Edwyn Pacheco
- Vernon Lewis
- Wayne Griner
- L. Friday
- Valentin Francisco
- Kerlotison
- EDGAR ADAMS
- Juan Rodriguez
- Paulo ALVARADO
- Danilo Mena
- JAMES Kishuk

68. Edward Leovan

69. RONALD PASCHAI

70. \_\_\_\_\_

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78. \_\_\_\_\_

Ed Leovan  
Ronald Paschai

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Held By

Kevin Nugent

Kevin A. Nugent

HSE DIRECTOR

Print Name

Sign

Training follows shipyard Safe Practices. Best Management Practice #1

BMP sections.

4.0, 4.1, 4.1.1, 4.1.2, 4.1.3

4.1.4, 4.1.5

File: U:\my documents\Toolbox Issues\091514

TRAINING CONSISTS OF DISCUSSION AND CONVERSATIONS WITH Q+A.

TRANSLATION WITH DANNY GARCIA, SHIPYARD COMPETENT PERSON.

TIME PERIOD 1000 AM to 1100 AM

See ATTACHED BMP sections

4.0

**BEST MANAGEMENT PRACTICES**

This Section presents the Best Management Practices for GMD Shipyard which be will implemented to reduce or minimize the potential for discharges or releases of toxic or hazardous materials to the waters of New York State

The BMP's identified in this plan cover management practices are designed to minimize the contact of storm water with potential pollutants, to eliminate surface water quality impairment. The BMP's identified for the Ship Building and Repairing Facilities focus on pollution control, containment of storm water pollutants, limited treatment, cleanup response, personnel training requirements, and the use of standard operating procedures and protocols. Key activities, target pollutants, and BMP's that address each industrial activity at the Facility are presented and summarized in Table 1.

**4.1 Good Housekeeping Practices**

Good housekeeping practices are designed to maintain a clean and orderly work environment at the facility. The most effective step towards preventing pollution of storm water from industrial activities simply involves using common sense to improve the Facility's basic housekeeping methods. A clean an orderly work area reduces the possibility of accidental spills caused by mishandling of chemical and equipment and will reduce safety hazards to facility personnel.

With regard to the hazardous materials identified in Section 3.3 of this Plan, the identified good housekeeping practices recommended for minimizing discharges of pollutants include improved operation and maintenance of industrial machinery and processes, material storage practices, material containment procedures, material transfer operations, material inventory controls, routine and regular clean-up schedules, maintaining well organized work areas, and employee training about all related practices.

**4.1.1 Operations and Maintenance**

The implementation of these practices are designed to ensure that process and equipment work well. The following good housekeeping practices are conducted at the Facility:

- Maintain dry and clean floors, ground surfaces, dry dock floors, and storm drains by using brooms, shovels, vacuum cleaners, and cleaning machines prior to and after ship docking;
- Regularly pickup and disposal of garbage and waste materials;
- Make sure equipment is working properly before use;
- Routinely inspect for leaks and conditions that could lead to discharge of chemicals or contact with storm water with raw and waste materials;
- Ensure that employees understand spill cleanup procedures.

#### 4.1.2 Material Storage and Containment Practices

Proper material storage and containment practice is designed to prevent release of materials and chemicals that can cause storm water runoff and dry dock drainage effluent pollution. The following storage and containment practices are conducted at the Facility:

- Provide adequate aisle space to facilitate material transfer and easy access for inspections;
- Storing chemical (paints and thinners) and petroleum product containers on containment systems, secondary containment, will prevent accidental leaks and spills. Secondary containment at the Facility of all liquids is designed to prevent spill and leaks from impacting surface water quality. Containment structures are located away from direct traffic routes to prevent accidental spills (see BMP 4, presented in Table 1).
- Storing liquid containers on containment pallets or similar devices to prevent corrosion of containers, and subsequent loss of integrity that could result in a leak or spill. (see BMP 9, presented in Table 1).
- Where feasible, <sup>leak</sup> containment of raw or waste material(s) will be covered, to prevent storm water contact.
- The Pollution Prevention Coordinator is assigned the responsibility of compiling the hazardous material inventory (see Section 4.1.4 - Material Inventory and Purchasing).

#### 4.1.3 Material Transfer Practices

Proper material transfer practices will prevent release of materials and chemicals that can cause storm water runoff and dry dock drainage pollution. The following material transfer practices are conducted at the Facility:

- For fuel oil storage, all fuel transfers are the responsibility of the delivery person who supplies the fuel oil;
- Upon arriving at the site, all delivery personnel will sign the visitor log located at the security gate. No visitors are allowed to conduct business at the Facility without signing the visitor log;
- As a safety measure, the Pollution Prevention Coordinator will assist the delivery personnel. Assigned plant personnel are responsible to ensure that both the vendor and any other personnel assisting with the off loading process wear proper personal protective equipment. Shipping documents are checked to verify the type and quality of the fuel or chemicals to be received prior to the transfer;
- The fuel oil aboveground storage tanks are equipped with a permanently installed mechanical gauge. Pollution Prevention Coordinator who also verifies the product level inside the tank during transfer operation by

manually gauging the product monitors the mechanical gauge. The tank is also equipped with a high level warning alarm that sounds when the tank is 95 percent full and a high level alarm which closes the tank fill valve when the tank is 98 percent full. The tank has an automatic shut-off when the tank reaches 90 percent full;

- A gate valve is located on each tank connection as close as practical to the tank, in accordance with the National Fire Protection Association No. 30. These valves are closed when transfer operations are not being conducted;
- All aboveground storage tanks shall be inspected on a monthly basis and integrity tested every ten years (see Section 4.3 - Preventative Maintenance and Inspections).

#### **4.1.4 Inventory Control and Purchasing Procedures**

Proper inventory control procedures will provide an up-to-date inventory of all materials stored (hazardous and non-hazardous) at the Facility. This inventory will identify which materials and activities pose the greatest risk to the environment, track how materials are stored and handled on-site, and reduce the costs by overstocking. The Material Inventory is presented in Table 5.

Purchasing procedures require that all vendors provide a Material Safety Data Sheet (MSDS) on all materials delivered to the Facility. Information contained on MSDS allows the Pollution Prevention Coordinator to determine whether or not the Facility will generate hazardous waste. The following inventory control practices are conducted at the facility:

- Materials are ordered on an as-needed basis to prevent overstocking and disposal of out-dated materials;
- Labeling of all containers to show the name and type of substance stored, stock number, and expiration date, health hazards, suggestion for handling, and first aid information;
- Clearly mark on the inventory hazardous materials that require special handling, storage, use, and disposal consideration;
- Determine whether material substitution from a hazardous to a non-hazardous material can be accomplished. Substitution of solvents for detergents can reduce potential impacts to storm water and increase recycling potential of spent materials.

#### **4.1.5 Employee Participation**

Employees will be trained in good housekeeping techniques to reduce the potential of materials and equipment to be mishandled. Motivation of employees to reduce waste generation and increase recycling is key to the facility pollution prevention training.

## Copy of Dry Weather Inspection:

Enclosure 10 Accomplished 9/5/2014

Dry Weather Inspection

5 September 2014

Permit # NYR00D162

1. Outflow locations per Quay Consulting Drainage System diagram of June 28, 2003, 009, 008, 004, and 003. These relate to my previous drains in order #4, #3, #2, #1 (See NOTES under Table)
2. Time and date per table: *Kevin Nugent 5 Sept 2014*

Outflow No.	Insp. Time/Date	Insp. Person	Describe Discharge	Source of discharge	Action Taken
009	1:54 PM 9/5/2014	Kevin Nugent	No discharge/ No flow	None	None
008	2:15 PM 9/5/2014	Kevin Nugent	No Discharge/ No Flow	None	None
004	2:35 PM 9/5/2014	Kevin Nugent	No Discharge/ No Flow	None	None
003	2:58 9/5/2014	Kevin Nugent	No Discharge/ No flow	none	None

### Notes:

- a. The northern most storm drains of #009 look to be clean, all had standing water at level of tide, there are some storm drains that need to be cleared
- b. The outflow #008 allegedly discharges near the sump pump discharge on the north side of caisson 5. There was no evidence of any outflow. There are many storm drains in the 008 system that need to be cleared of debris.
- c. The outflow #004 has active construction and has been disturbed. Attached is a picture of what I believe remains of the last storm drain before the discharge. The discharge area has active construction taking place. Past this drain there is water, the entire end of the pier has been removed. See pictures:
- d. The outflow 003 is not on GMD Shipyard property. I reviewed the area and found no flow. However, there was a complete change and extensive construction on this property so there is no way for me to know if the drain system is intact. I reported what I observed.

